

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

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MASTER DOCKET

18-md-02865-LAK

**DECLARATION OF SEAN K. MULLEN**

I, Sean K. Mullen, an attorney duly admitted to practice law before the courts of the State of New York, hereby declare under penalty of perjury:

1. I am a member of the law firm Dewey Pegno & Kramarsky LLP, counsel for Michael Ben-Jacob. I am fully familiar with the matters set forth in this declaration.

2. I submit this declaration in support of Defendant Michael Ben-Jacob's Supplemental Memorandum of Law in support of his Motion for Summary Judgment and his Supplemental Rule 56.1 Statement of Material Facts in Support of His Motion for Summary Judgment.

3. Attached hereto as Exhibit 1 is an excerpt from the deposition transcript of Michael Ben-Jacob.

4. Attached hereto as Exhibit 2 is an excerpt from the deposition transcript of John van Merkensteijn.

5. Attached hereto as Exhibit 3 is an excerpt from the deposition transcript of Peter Wells.


6. Attached hereto as Exhibit 4 is a document, Bates-stamped WH\_MDL\_00355444, and produced in discovery in this matter.

7. Attached hereto as Exhibit 5 is an excerpt from the deposition transcript of Robert Klugman.

8. Attached hereto as Exhibit 6 is Plaintiff SKAT's Responses and Objections to Michael Ben-Jacob's First Requests for Admission.

I, Sean K. Mullen, declare under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2022  
New York, NY

  
Sean K. Mullen